

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

SUE BELL,

* CIVIL ACTION NO. 6:13-cv-00776

*

Plaintiff,

*

*

VERSUS

* JUDGE RICHARD T. HAIK, SR.

*

HERCULES LIFTBOAT COMPANY, L.L.C.

*

*

Defendant.

* MAGISTRATE C. MICHAEL HILL

DEFENDANT'S RULE 12(b)(6) MOTION TO DISMISS

NOW INTO COURT, through undersigned counsel, comes defendant, Hercules Liftboat Company, LLC (“Hercules”), and respectfully moves this Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for an order dismissing plaintiff’s “Petition for Damages,” on the grounds that the plaintiff’s lawsuit fails to state a claim upon which relief can be granted and should, therefore, be dismissed as a matter of law.

Respectfully submitted,

/s/ Stephen P. Beiser

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon counsel listed below via the Court's CM/ECF system on this 4th day of June, 2013.

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/s/ Stephen P. Beiser

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